

IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

KENNETH R. WEBER,

Chapter 13

Debtor

Bankruptcy No 19-22111-TPA

Document #

NEW REZ, LLC d/b/a SHELLPOINT

MORTGAGE SERVICING,

Movant

Related document: Proof of Claim #10-2

VS.

KENNETH R. WEBER,

Respondent

**September 4, 2020, DECLARATION THAT EXISTING CHAPTER 13 PLAN IS
SUFFICIENT**

AND NOW comes the Debtor/Respondent **KENNETH R. WEBER** by his attorney Susan J. Pearlstein, and respectfully states as follows:

1. The Notice of Mortgage Payment Change filed by Movant at Claim #10-2 on September 3, 2020, reflects a total monthly mortgage payment to be paid to the above secured creditor in the amount of \$578.13 effective October 1, 2020.

2. No amendment to the Plan will be necessary for this change to be implemented; the total existing Chapter 13 plan payment is sufficient to pay this amount on a monthly basis.

Respectfully Submitted:

/s/ Susan J. Pearlstein, Esquire

Susan J. Pearlstein, Esquire

PA I.D. #28939

525 Smithfield Street, #630

Pittsburgh, PA 15222

(412) 281-1766

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suemejp@gmail.com

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CERTIFICATE OF SERVICE

I, Susan J. Pearlstein, Esquire, of 535 Smithfield St. #630, Pittsburgh, PA 15222 certify upon penalty of perjury that on the 4th day of September, 2020, I served a copy of the 9/4/2020 DECLARATION THAT THE EXISTING CHAPTER 13 PLAN IS SUFFICIENT by U.S. first class mail, postage pre-paid, upon the following:

Karen A. Maxcy
McCalla Raymer Leibert Pierce, LLC
1544 Old Alabama Rd.
Roswell, GA 30076

U.S. Trustee
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222

Kenneth R. Weber
2504 Sunset Drive
West Mifflin, PA 15122

Rhonda Winnecour, Trustee
By ECF

/s/ Susan J. Pearlstein, Esquire

Susan J. Pearlstein, Esquire

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